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21 Attorneys for Plaintiff Matthew Pliskin,
22 as Trustee of the ICPW Nevada Trust
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24
25 **UNITED STATES DISTRICT COURT**
26 **CENTRAL DISTRICT OF CALIFORNIA (WESTERN DIVISION)**
27

28 MATTHEW PLISKIN, AS TRUSTEE OF THE
ICPW NEVADA TRUST

Plaintiff,

-against-

ROBERT GOLDSTEIN and DRG STRATEGIC,
LLC d/b/a/ MERIDIAN GLOBAL,

Defendants.

Case. No.: 2:18-cv-09491-FMO(ASx)

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN
30 DAYS (L.R. 8-3)**

Complaint served: November 26, 2018
Current response date: December 17, 2018
New response date: January 16, 2019

WHEREAS, Plaintiff Matthew Pliskin, solely in his capacity as Trustee for the ICPW Nevada Trust, filed Case No. 2:18-cv-09491-FMO(ASx) against Defendants Robert Goldstein and DRG Strategic, LLC, on November 8, 2018;

1 WHEREAS, Plaintiff served his Summons and Complaint on Defendants on November 26,
2 2018;

3 WHEREAS, pursuant to F.R.C.P. 12(a), Defendants were required to serve a response to the
4 Complaint on or before December 17, 2018;

5 WHEREAS, there have been no previous agreements or requests submitted to the Court
6 regarding an extension of time in this matter;

7 WHEREAS, Defendants previously communicated to Plaintiff that they were not represented
8 by counsel and that they required additional time to retain an attorney and respond to the Summons
9 and Complaint;

10 WHEREAS, Defendants have requested, and Plaintiff has agreed, pursuant to L.R. 8-3, to an
11 extension of 30 days beyond December 17, 2018 for Defendants to respond to the Complaint.

12 NOW, THEREFORE, by and through their respective counsel, Plaintiff and Defendants
13 stipulate and agree that Defendants' response to Plaintiff's Complaint shall be due on or before
14 January 16, 2019. Defendants further stipulate and agree not to contest service of process, but
15 otherwise reserve all rights and defenses, including the right to contest personal jurisdiction and
16 venue.

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18 Dated: January 11, 2019

DENTONS US LLP

By: /s/ Ahmed ("Andy") R. Jinnah

Samuel R. Maizel

Tania M. Moyron

Ahmed ("Andy") R. Jinnah

SOLOMON & CRAMER LLP

By: /s/ Andrew T. Solomon

Andrew T. Solomon (*admitted pro hac vice*)

Attorneys for Plaintiff Matthew Pliskin, as
Trustee for the ICPW Nevada Trust

1 Dated: January 11, 2019

LTL ATTORNEYS LLP

By: /s/ Joe H. Tuffaha

Joe H. Tuffaha

(Bar No. 253723)

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